

Untitled

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Southern Union Company)

Petition for Authorization and)

Approval of (1) Issuance of Up to) D.T.E. 01-32

\$ 400 Million of Long-Term Debt and)

An Exemption from M.G.L. c. 164 §§ 15 and 15A)

PETITION TO INTERVENE

ON BEHALF OF THE

COMMONWEALTH OF MASSACHUSETTS

DIVISION OF ENERGY RESOURCES

The Division of Energy Resources of the Commonwealth of Massachusetts ("DOER") hereby petitions for leave to intervene and participate in the above-captioned proceeding, pursuant to M.G.L. c. 25A, § 6, c. 30A, §§ 10 and 11, c. 164 App., §§ 2-1 through 2-10, and 220 CMR §§ 1.03, 7.00 et seq. and 225 CMR 4.00.

In support of its request, the Petitioner states the following:

1. Petitioner's name and address are as follows:

Commonwealth of Massachusetts

Division of Energy Resources

70 Franklin Street, 7th Floor

Boston, MA 02110

2. Petitioner is the Massachusetts executive agency responsible for establishing and implementing the Commonwealth's energy policies and programs, generally. (M.G.L. c.

25A, § 6).

3. Pursuant to M.G.L. c. 25A, § 6, Petitioner is authorized and directed to:

(1) plan, develop, oversee, and operate programs to help consumers understand, evaluate, and select retail energy supplies and related services offered as a consequence of electricity and gas utility restructuring;

(2) develop and administer programs relating to energy conservation, alternative energy development, non-renewable energy supply and resources development, energy bond authority, energy information and energy emergencies;

(3) advise, assist, and cooperate with other state, local, regional, and federal agencies in developing appropriate program and policies relating to energy planning and regulation in the Commonwealth;

(4) develop energy data and information management capabilities to aid energy planning and decision-making; and

(5) promote the development of sound energy education programs.

6. Petitioner's ability to develop and implement consistent governmental policies with respect to the Commonwealth's energy programs will be substantially and specifically affected by this proceeding.

7. Petitioner requests the right to participate in all aspects of this case, including, as it deems necessary, the presentation of testimony, cross-examination of witnesses, and the presentation of arguments orally and through briefs.

Respectfully submitted,

Untitled

Commonwealth of Massachusetts
Division of Energy Resources

By its attorney:

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